

EXHIBIT A

TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant DEVELOPMENT COUNSELLORS INTL. LTD. 733 Third Avenue - Suite 2100, New York, N. Y. 10017	2. Registration No. 1421
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3. Name of foreign principal THE NATIONAL DEVELOPMENT CORP.	4. Principal address of foreign principal P.O. Box 495 27 Brazil Street Castries, St. Lucia, W.I.
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5. Indicate whether your foreign principal is one of the following type:

☒ Foreign government

☐ Foreign political party

☐ Foreign or ☐ domestic organization: If either, check one of the following:

☐ Partnership

☐ Committee

☐ Corporation

☐ Voluntary group

☐ Association

☐ Other (specify) _____

☐ Individual - State his nationality _____

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant.

NATIONAL DEVELOPMENT CORP.

b) Name and title of official with whom registrant deals.

Mr. Leslie Clarke

7. If the foreign principal is a foreign political party, state:

a) Principal address not applicable

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

not applicable

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b) Is this foreign principal

- Owned by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐
- Directed by a foreign government, foreign political party, or other foreign principal. . . . Yes ☐ No ☐
- Controlled by a foreign government, foreign political party, or other foreign principal . . Yes ☐ No ☐
- Financed by a foreign government, foreign political party, or other foreign principal . . . Yes ☐ No ☐
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐
- Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

N/A

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

not applicable

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

not applicable

Date of Exhibit A 4/3/79	Name and Title Ted M. Levine, Pres.	Signature <i>Ted M. Levine</i>
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UNITED STATES DEPARTMENT OF JUSTICE
Washington, D.C. 20530

EXHIBIT B

TO REGISTRATION STATEMENT
Under the Foreign Agents Registration Act
of 1938, as amended

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
development counsellors intl. ltd.	ST. LUCIA NATIONAL DEVELOPMENT CORP.

Check Appropriate Boxes:

- ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- ☐ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Shall develop copy and allied materials for a single full page advertisement in the February 27, 1979 WALL STREET JOURNAL.

Shall deliver the required material to St. Lucia National Development Corp. and they shall handle all copy clearance procedures.

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5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

All such details are in the attached agreement.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?^{1/} Yes ☐ No ☒

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

not applicable

Date of Exhibit B	Name and Title	Signature
4/3/79	Ted M. Levine, Pres.	

^{1/} Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.



Development Counsellors International, Ltd.
733 THIRD AVENUE • NEW YORK, N.Y. 10017 • (212) MU 7-1383

January 16, 1979

FEB 5 1979

Patrick J. Sylvester
Director, USA
St. Lucia National Development Corp.
220 E. 42 St., Room 408
New York 10017

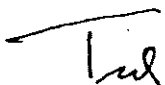
Dear Pat:

This letter shall confirm our agreement on a single specific project that Development Counsellors International is currently undertaking for the St. Lucia National Development Corp. These are the relevant points:

- (1) DCI shall develop copy and allied materials for a single full page advertisement in the February 27, 1979 WALL STREET JOURNAL keynoting the political independence of St. Lucia on February 22.
- (2) DCI shall receive compensation on this project through the standard commission method of 15% or a total of \$2,850.
- (3) DCI shall deliver the required material to you and you shall handle all copy clearance procedures.

It is a great personal pleasure to me to work with you once again on this important project.

Sincerely,


Ted M. Levine
President

P.S. One further point: since we are serving as your advertising agency on this single ad, DCI shall receive prepayment of the gross advertising cost of \$19,000 in advance of publication on February 27, 1979.

Term 1d
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